

October 24th, 2004

Dear Sirs:

I wish to express serious concern regarding current proposals pertaining to the administration and regulation of the broadcast service known as LBFM. It has come to my attention that the wider implementation of this technology will force your agency to reconsider its priorities as applied to the distribution of broadcast frequencies, specifically those assigned to FM translators. I believe that the implications of these changes present a threat to the high quality programming that currently uses these frequencies.

I continue to support, through charitable donations, one of the stations that make extensive use of translators (K-LOVE 105.5, 89.1 and 100.9). This organization is an example of a non-commercial interest making extensive use of this publicly managed resource to reach a greater population than would be possible otherwise. Indeed, your agency is chartered to serve precisely this kind of broadcasting, presenting access to a variety of programming not possible to sustain on this scale in a purely commercial setting.

K-LOVE, AIR ONE, and stations like them, present messages that are of high interest to many thousands of listeners removed from the major metropolitan areas. The fact that they are sustained by listener donations should make the point that this is an interactive media, both serving and uniting the community. The people that run these stations are committed to serve their listeners by presenting a powerful message of hope.

This last point deserves more explanation. The fact that these are people using this medium is extremely relevant. The real pressure to impinge on the space used by these stations will be produced by the ever-growing use of radio frequencies by devices that implement Wi-Fi, Bluetooth and other formats.

Some portion of the bandwidth will certainly be comprised of radio stations. However, an increasing amount of the airwaves will actually be comprised of machines talking to other machines. The path of least resistance for you will likely favor dealing with a client that 1.) Has no content that would require review, monitoring or censorship 2.) Would represent fewer technical challenges to maintaining signal fidelity 3.) Would generate revenue, being subject to fees and taxes appropriate for a commercial interest.

The temptation to set aside the public interest will be tremendous. The impact on the listening public could be devastating by eliminating their access to programming that edifies moral values, celebrates the spiritual life and provides a hopeful message in a hurting world. Please demonstrate your commitment to act in the public interest by continuing to defend the right of stations like K-LOVE to serve so many so well.

Sincerely,
Russell Ash